

157679

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

INTER - OFFICE CORRESPONDENCE

DATE: November 27, 1972
MEMO TO: Enforcement Services Section, DLPC
FROM: Surveillance Section, DLPC
SUBJECT: ST. CLAIR COUNTY - Land Pollution Control
Sauget/Sauget

I Sauget and Company
Paul Sauget, Secretary and Manager

II III IV	<u>Date</u>	<u>Time</u>	<u>Weather</u>	<u>Persons Present</u>
	6/01/71	3:30 p.m.	Sunny, Clear	Mensing, Bob Dailey
	7/12/71	2:30 p.m.	Sunny, Hot	Mensing, Child, Dailey
	9/14/71	10:15 a.m.	Sunny, Hot	Child, Richard Ticer
	9/30/71	10:05 a.m.	Warm, Clear	Mensing, Child, Dailey
	11/11/71	3:00 p.m.	Warm, Clear	Mensing, Dailey
	12/02/71	12:00 p.m.	Cold, Clear	Child, Daily, Ticer
	1/25/72	10:45 a.m.	Cold, Clear	Mensing, Child, McCarthy, Dailey
	2/14/72	11:00 a.m.	Cool, Clear	Mensing, Child, Dailey
	3/07/72	10:55 a.m.	Cldy., Warm	Mensing, Dailey
	3/14/72	2:00 p.m.	Sunny, 65°	Mensing, McCarthy, Vollmer, Dailey, T. Clark
	3/15/72	1:15 p.m.	Cldy., Wet, 50°	Mensing, McCarthy, Vollmer, Dailey
	4/13/72	2:45 p.m.	Ptly. Cldy., 85°	Mensing, Dailey
	5/03/72	3:45 p.m.	Cldy., 55°	Mensing, Child, Dailey
	5/04/72	11:15 a.m.	Clear, 65°	Mensing, Child
	5/22/72	1:50 p.m.	Sunny, 90°	Mensing, Child, McCarthy, Dailey

EVERY INTER-OFFICE LETTER SHOULD HAVE ONLY ONE SUBJECT.
ALL LETTERS TO BE SIGNED . . . NO SALUTATION OR COMPLIMENTARY CLOSING NECESSARY.

<u>Date</u>	<u>Time</u>	<u>Weather</u>	<u>Persons Present</u>
5/23/72	9:45 a.m.	Sunny, 80°	Mensing, Child, Dailey
6/07/72	4:15 p.m.	Clear, 80°	Mensing, Child, Sauget, Ticer
6/08/72	7:05 a.m.	Clear, 65°	Child
7/03/72	1:30 p.m.	Cldy., 80°	Mensing, Child, Dailey
7/27/72	12:00 p.m.	Clear, Mild	Child, G. Phillips
8/03/72			Child, T. Clark
9/05/72	3:45 p.m.	Ptly. Cldy, 78°	Mensing, McCarthy, Dailey
9/06/72	11:00 a.m.	Clear, 75°	Mensing, McCarthy
10/11/72	9:40 a.m.	Cldy., 70°	Mensing, McCarthy, Dailey
10/16/72	3:00 p.m.	Clear, 72°	Mensing, Child, Sauget
10/17/72	2:30 p.m.	Cldy, 60°	Mensing
10/18/72	10:00 a.m.	Cldy, 40°	Mensing
11/03/72	11:00 a.m.	Cldy, 45°	Mensing, Child, Dailey

V

<u>Date</u>	<u>Nature of Conversation</u>
6/01/71	Mensing informed Bob Dailey, site manager, that a few 55 gallon drums of liquid (which appeared to be varnish, solvents and paint by-products) were being deposited in the fill area. Dailey was informed that dumping of liquids at the landfill should cease immediately.
7/21/71	Mr. Dailey was informed that chemicals emptied from barrels and placed in a dike impoundment on the landfill site should cease and that no liquids should be accepted at the landfill.
9/14/71	William Child pointed out to operator Richard Ticer a few small areas on the fill face which required additional cover.
9/30/71	Mr. Sauget was informed by phone to immediately discontinue accepting septic tank pumpings at his site.
11/11/71	Mr. Dailey was informed not to dump refuse into the pool of septic tank waste.
12/02/71	William Child indicated to Mr. Dailey that Marker Buoys had been dumped into the pool of septic tank waste and that no refuse should be dumped in the waste.

<u>Date</u>	<u>Nature of Conversation</u>
1/25/72	Mr. Dailey was asked what they plan to do about cover material as the available supply is used up. He said they would truck it in.
2/14/72	Mr. Dailey requested permission to place large rocks and concrete in the area previously used for disposal of septic tank waste. Mr. Dailey was given permission to do so.
3/07/72	Mr. Dailey requested permission to fill in the pool of septic tank liquid with general refuse. This request was verbally denied. Mr. Dailey also stated that they will need to haul in cover material as they fill in the southeast corner of the site.
3/14/72	Mr. Dailey was informed of areas on the site which needed additional cover.
3/15/72	Mr. Dailey was informed that open dumping was observed and that adequate daily cover was not being applied.
4/13/72	Mr. Dailey was told that the finished portions of the site have not received satisfactory final cover.
5/03/72	Mr. Dailey was informed that refuse was observed in an area of standing water and that exposed refuse was observed in an area detached from the active fill area. Mr. Dailey was told that these deficiencies should be rectified.
5/22/72	Mr. Dailey was informed that random probings revealed that the cover material on top of fill was only averaging 3 to 4 inches. Also, he was told that fencing and restrictions should be installed on the south end of the site. Mr. Dailey was again told about the need to apply final cover.
5/23/72-	Same as May 22, 1972.
6/07/72	Mr. Sauget was informed that restrictions should be erected at south end of the site, Mr. Sauget was also told that less than six inches of cover material has been placed over the refuse on top of the fill.
7/03/72	Mr. Dailey was informed of the following observations: Smoke was observed emanating from an underground fire in the fill area, a pool of liquid was observed to have been dumped at the base of the fill, some refuse was observed to have been promiscuously dumped along a road leading into the south end of the site, no restriction was present at the south of the site.
9/05/72	Mr. Dailey was informed that refuse was observed in an area of ponded water. He stated that the water was rainwater and that the rain caught them while they were dumping in the low area and that they couldn't cover the refuse.

Date Nature of Conversation

10/11/72 Mr. Dailey stated that they had been dumping in the new area south of the Alton & Southern Railroad tracks since October 6, 1972.

10/16/72 Paul Sauget stated that the new dumping area was covered by the Public Health Registration since it was the same lot number and same owner. Mr. Sauget also stated that he is still working on obtaining a permit for the area. Mr. Sauget was informed that the Agency felt that he needed an E.P.A. permit before he could dump in the new area. He was further informed that investigation disclosed that the old and new dumping areas were not included in the same lot number. He was also informed that many areas on his old site lacked the six inch daily cover and that final cover should be applied to the site.

11/03/72 Mr. Dailey was informed about the area on the site that contained an underground smouldering fire. Mr. Dailey stated that he knew about the fire.

VI Sauget & Company
2902 Monsanto Avenue
Sauget, Illinois 62206

VII Attached.

VIII The following is a compilation of data indicating non-compliance with the P.C.B. opinion (PCB 71-29) dated May 26, 1971.

Order #1 - Inadequate daily cover was observed on:

3/14/72	5/04/72	6/07/72	11/06/72	10/17/72
3/15/72	5/22/72	6/08/72	10/11/72	10/18/72
5/03/72	5/23/72	11/05/72	10/16/72	11/03/72

Order #2 - Respondent used fly ash cover material on the following dates:

6/01/71	9/14/71	11/11/71	2/14/72	3/14/72
7/12/71	7/27/71	1/25/72	3/07/72	3/15/72

Order #3 - Open dumping was observed on:

3/14/72	5/04/72	6/07/72	11/06/72	10/17/72
3/15/72	5/22/72	6/08/72	10/11/72	10/18/72
5/03/72	5/23/72	11/05/72	10/16/72	11/03/72

Order #4 - Smoke emanating from an underground fire was observed on the following dates:

7/03/72	10/17/72
7/27/72	10/18/72
9/05/72	11/03/72
9/06/72	

Order #5 - Liquids were observed to have been dumped on the following dates:

6/01/71	9/30/71
7/12/71	7/03/72
9/14/71	7/27/72

Order #6 - On the following dates, adequate restrictions were not present on the south end of site:

5/22/72	6/08/72	10/16/72
5/23/72	7/03/72	10/17/72
6/07/72	10/11/72	10/18/72

Order #7 - Sorting of refuse by hand was observed on the following date:

12/02/71

Letters to E.P.A. from Paul Sauget

7/28/71 Mr. Sauget wrote that the disposal of liquid waste at the sauget landfill has been discontinued as of July 13, 1971. He stated that they are not accepting any liquid waste material until a method of disposal is established within accordance of Rules and Regulations.

Liquids were subsequently observed to have been dumped in the site on:

9/14/71	7/03/72
9/30/71	7/27/72

4/20/72 Mr. Sauget wrote to say that the only open dumping is when refuse is being dumped from the trucks. He also said that the refuse is being covered daily, even if the inspectors do not think so.

- X At times the odor emanating from the adjacent toxic chemical dump is very strong and pungent.
- XI No nearby residences
- XII None.
- XIII Included.
- XIV Lot #304, 6th Subdivision, Cahokia Commonfields, T2N., R.10W., 3rd P.M., St. Clair County, Illinois.
- XV Presently the site is registered with the Department of Public Health. Mr. Sauget has applied for a permit, but the applications so far have been denied.

Since October 6, 1972 Mr. Sauget has been dumping in an area south and adjacent to the area where he had been dumping for years. This new area is south of the Alton and Southern Railroad tracks. Mr. Sauget stated that the new area is included in the Public Health Registration, since it has the same owner and is included in the same lot number. A check with Emmett Walsh of the St. Clair County Mapping and Platting Department revealed that the new dumping area is included in lot number 302, not lot number 304.

M E M O R A N D U M

October 13, 1970

ST. CLAIR COUNTY - Solid Waste Disposal
Sauget/Paul Sauget

TO: Environmental Protection Agency
Bureau of Land Pollution Control

FROM: Kenneth G. Mensing, Sanitary Inspector,
Region II

SUBJECT: Sauget - Paul Sauget Waste Disposal Site Profile

- April 11, 1966 - Inspection of site, open burning, open dumping.
- May 10, 1966 - Inspection of site, open dumping of refuse.
- March 2, 1967 - Inspection of site, open dumping of refuse.
- March 16, 1967 - Registration forms were received from Sauget & Company.
- October 18, 1967 - Inspection of site revealed eleven (11) violations of the Illinois Refuse Disposal Law and pertaining Regulations.
- November 1, 1967 - Inspection of site, same violations present as observed on October 18, 1967.
- November 29, 1967 - Inspection of site, same violations present as observed on October 18, 1967.
- December 28 & 29, 1967- and January 22, 1968 Inspections of site, same violations present as observed on October 18, 1967. Twelve (12) violations of the Illinois Refuse Disposal Law and pertaining Regulations. A certified letter and telegram were sent to Mr. Paul Sauget on January 25, 1968, listing the violations noted and informing him that the site was not acceptable for receiving refuse.
- January 30, 1968 - Received letter and telegram from Paul Sauget which stated he will comply with the pertaining Law and Regulations and requested an inspection on February 29, 1968.
- February 1, 1968 - Inspection of site, observations indicated that action had been initiated towards correcting the violations.
- February 2, 1968 - Telegram sent by this Department stating that the site was satisfactory for the acceptance of refuse.
- February 9, 1968 - Inspection of site, found to be in compliance with the Refuse Disposal Law and Regulations.
- February 15, 1968 - Inspection of site, operation was deemed satisfactory.
- February 20, 1968 - Inspection of site, found to be satisfactory.

- March 5, 1968 - Inspection of site, lack of cover material along edge of active fill area.
- March 14, 1968 - Inspection of site, operation found to be satisfactory.
- March 21, 1968 - Inspection of site, lack of cover material along edge of active fill area.
- April 15, 1968 - Inspection by this Department revealed operation had deteriorated. Violations observed were: scavenging, not providing daily cover material, exposed refuse at several locations along west side of site due to erosion of the cover material, septic tank leaching ponds located on the completed fill area were overflowing over the edge of the landfill onto adjacent terrain, and the completed fill areas had not received a final depth of 24 inches of cover material.
- April 25, 1968 - Inspection of site, same violations present as observed on April 15, 1968.
- May 23, 1968 - Inspection of site, no improvements had been rendered, in fact, further deterioration of site had occurred.
- June 27, 1968 - Inspection of site, further degradation had occurred. A certified letter was sent to Mr. Paul Sauget discussing the eleven (11) violations observed and that the site is not acceptable for the receiving of refuse.
- July 10, 1968 - Inspection of site, no improvements had been made, no daily cover, a smoldering fire was observed at south end of fill.
- July 11, 1968 - Inspection of site, no operational improvements made.
- July 13, 1968 - Inspection by this Department revealed the same violations were existant, as well as the following additional items: Attendant was engaged in the burning of other combustible wastes at the brush burning site, access to the site was not totally restricted as attendant stated four (4) loads were dumped during the night, and debris had been openly dumped into liquid chemical ponds.
- July 14, 1968 - No operational improvements made. Refuse was not receiving daily cover, no landfill equipment observed on the site while refuse was being dumped, septic tank wastes had been openly dumped along south edge of fill, sign at entrance indicated site is closed on Sundays, but site was open and refuse was observed being dumped, and attendant was observed scavenging through refuse.
- July 22, 1968 - Inspection by this Department revealed that the face of the fill was not receiving daily cover, the shelter was not screened, exposed refuse still existed along the entire west edge of the site (except for 20% of the total area where earth had been applied), open chemical ponds and wire dumping

site contained debris that required daily cover, and haulers were dumping at the site. Improvements since last inspection were: The loading of salvaged items onto a semi-trailer, and the restricting of combustible wastes at the brush burning site.

- July 23, 1968 - This Department requested injunctive relief through the St. Clair County States Attorney's Office.
- August 6, 1968 - Inspection of site, not receiving daily cover, open pond of chemical wastes, access to site not restricted, no portable fencing provided.
- August 7, 1968 - A hearing before Circuit Court Judge Troy was postponed from August 7, 1968 to August 14, 1968.
- August 13, 1968 - Inspection of site, improvement of site restrictions, screened shelter has been provided for the attendant, additional cover material has been placed on the northern half of the landfill site, additional cover material had been spread along the west slope of entire site, portable fencing had been installed along the east side of the active operation.
- August 27, 1968 - Inspection of site, evidence of entrance around cable, yesterday's refuse was well covered, good supply of cover material.
- August 30, 1968 - Letter to Paul Sauget stating that the site was in compliance and was now acceptable for receiving refuse.
- September 4, 1968 - Inspection of site, essentially in compliance except for deposition of chemicals.
- September 13, 1968 - Inspection of site, site in compliance.
- October 1, 1968 - Inspection of site, some scattered refuse present, area needs policing.
- October 22, 1968 - Inspection of site, present fill area has extended past the portable fencing, present fill area has extended south to within 100 yards of the sewage lagoon.
- November 25, 1968 - Inspection of site, the portable fencing is not properly located, chemicals and oil are being dumped at the west side of the present fill area.
- December 23, 1968 - Inspection of site, litter was scattered throughout the fill area, sufficient portable fencing was not provided, face of the present fill area is not receiving sufficient daily cover, exposed refuse was noted at the face west of the unloading area.
- January 20, 1969 - Letter sent to Paul Sauget detailing the violations observed during the December 23, 1968 inspection.

- February 5, 1969 - Inspection of site, site is in need of policing, more fencing is needed, salvage materials and lumber are stored throughout site.
- March 19, 1969 - Inspection of site, not covering daily, portable fencing not adequate, unsatisfactory salvage operations, litter is not policed sufficiently.
- May 16, 1969 - Inspection of site, exposed refuse observed, portable fencing inadequate, refuse is not being covered daily.
- June 6, 1969 - Letter sent to Paul Sauget informing him of deficiencies observed during May 16, 1969 inspection.
- April 14, 1970 - Letter from Air Pollution Control Board to Jim Kechner, Office of the Attorney General informing him of a fire which raged out of control at the Sauget landfill on April 9, 1970.
- May 14, 1970 - Inspection of site, adequate daily cover is not being provided, an area approximately 50 feet by 50 feet of exposed refuse was present, portable fencing was not being provided, roads were not being maintained properly, entire site was in need of policing.
- May 22, 1970 - Letter sent to Paul Sauget describing the deficiencies observed in the May 14, 1970 inspection, requested to correct immediately.
- June 18, 1970 - Inspection of site, extensive burning of refuse including tires.
- June 19, 1970 - Inspection of site, the fire on June 18, 1970 had been extinguished, improvement of site, one small area of exposed refuse.
- July 29, 1970 - Inspection of site, adequate daily cover of all refuse is not being provided, entire fill face is exposed, completed portions of the fill have not received the required final cover.
- August 11 & 12, 1970 - Inspection of site, daily cover of all refuse is not being provided, entire face of fill was exposed which is approximately 100 yards long by 10 to 15 feet high. Sanitary Inspector Andy Vollmer took color pictures on both days.
- August 21, 1970 - Letter to Paul Sauget pointing out the violations observed during the July 29, 1970 inspection, informed to correct violations immediately. Requested to submit statement outlining plans for providing the required final cover on all finished portions.

Kenneth G. Mensing

KGM:mhs

cc: Region II